

1 PHILLIP A. TALBERT
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

2:20-MC-00301-WBS-CKD

12 Plaintiff,

13 v.

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

14 APPROXIMATELY \$42,687.68 SEIZED
FROM WELLS FARGO BANK
15 ACCOUNT NUMBER 320-3742212,

16 APPROXIMATELY \$1,840.42 SEIZED
FROM WELLS FARGO BANK
17 ACCOUNT NUMBER 517-7263489,

18 APPROXIMATELY \$629.84 SEIZED
FROM WELLS FARGO BANK
19 ACCOUNT NUMBER 532-7107099,

20 APPROXIMATELY \$143.04 SEIZED
FROM WELLS FARGO BANK
21 ACCOUNT NUMBER 530-4807349,

22 APPROXIMATELY \$50.08 SEIZED
FROM WELLS FARGO BANK
23 ACCOUNT NUMBER 333-4403940, AND

24 APPROXIMATELY \$16,566.00 IN
U.S. CURRENCY,
25

26 Defendants.

27 It is hereby stipulated by and between the United States of America and potential claimants Pablo
28 Salcedo Jr. and Karina Salcedo (“claimants”), by and through their respective counsel, as follows:

1 1. On or about September 16, 2020, claimants filed a claim in the administrative forfeiture
2 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$42,687.68 seized
3 from Wells Fargo Bank Account Number 320-3742212, Approximately \$1,840.42 seized from Wells
4 Fargo Bank Account Number 517-7263489, Approximately \$629.84 seized from Wells Fargo Bank
5 Account Number 532-7107099, Approximately \$143.04 seized from Wells Fargo Bank Account Number
6 530-4807349, Approximately \$50.08 seized from Wells Fargo Bank Account Number 333-4403940, and
7 Approximately \$16,566.00 in U.S. Currency, (hereafter “defendant funds”), which were seized on or
8 about June 18, 2020.

9 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
10 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
11 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
12 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

13 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
14 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
15 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
16 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
17 That deadline was December 15, 2020.

18 4. By Stipulation and Order filed December 15, 2020, the parties stipulated to extend to
19 February 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 5. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April
23 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

25 6. By Stipulation and Order filed April 13, 2021, the parties stipulated to extend to June 11,
26 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28 7. By Stipulation and Order filed June 11, 2021, the parties stipulated to extend to July 12,

2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to September 10, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture shall be extended to September 10, 2021.

Dated: 7/9/2021

PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


Dated: 7/9/2021

/s/ Melissa Dougherty
MELISSA DOUGHERTY
Attorney for potential claimants
Pablo Salcedo Jr. and Karina Salcedo

(Signature authorized by email)

IT IS SO ORDERED.

Dated: July 12, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE